

March 20, 2020

Project No. 913-1101-020.001.1G

Neal Conor

U.S. Environmental Protection Agency, Region 10
1200 Sixth Avenue, Suite 155
Seattle, WA 98101-3123

RESPONSE TO U.S. ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON “DRAFT 2018 SUMMARY REPORT ON GROUNDWATER CONDITIONS, MONSANTO SODA SPRINGS, IDAHO PLANT” JUNE 21, 2019

Dear Mr. Conor:

On July 26, 2019, the United States Environmental Protection Agency (EPA) issued comments on the report titled *Draft 2018 Summary Report on Groundwater Conditions, Monsanto Soda Springs Idaho Plant*¹, dated June 21, 2019. This letter provides responses to EPA's comments. A revised report has been prepared incorporating the comments and is attached.

1.0 SPECIFIC COMMENTS

Comment: *Section 4.2.1.3, page 22. Text states “TW-91 was drilled in UBZ-3 on the South Plant Fence line on the east side of the Primary Fault, between TW-11 and 12 and TW-81 (Figure 2) in order to determine whether constituents from source(s) in the UBZ-4 were not being captured [italics added] by the Plant Production Wells and were flowing southward from the Monsanto Plant in the UBZ-3”. Reword to clarify, for example “...to determine whether or not constituents are being captured...”*

Response: This sentence has been reworded as requested.

Comment: *Table 9a: Make COC exceedances of RGs in **Bold**.*

Response: Table 9a (and Table 9b) have been updated to show exceedances of the respective RGs in bold for reference.

Comment: *Figure 8: Change the “2nd” 5890 contour in UBZ-2 to 5880.*

Response: Figure 8 (and Figure 9) have been updated as requested.

¹ Golder. 2019. Groundwater and Surface Water Sampling Work Plan, Bayer Company Soda Springs Idaho Plant. April 22.


Please contact us if you have any questions or need additional information.

Sincerely,

Golder Associates Inc.



Michael Klisch, LHG
Senior Project Hydrogeologist



David Banton, LHG, RG
Principal Hydrogeologist

MK/DB/ks

CC: Jason Maughan, Monsanto Co, c/o P4 Production LLC
Randy Cooper, Bayer
Stan Christensen, Idaho Department of Environmental Quality

Attachments: 2018 Summary Report on Groundwater Conditions, Monsanto Company,
Soda Springs, Idaho Plant

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